

EXHIBIT A

From: John Di Giacomo <john@traverselegal.com>
Subject: Re: 11-13381 Stip for First Amended Complaint
Date: December 29, 2011 2:57:07 PM EST
To: Susan Woodrow <suzywoodrow@hotmail.com>
Bcc: Al Dalesandro <al@traverselegal.com>



Susan,

I disagree with your recollection of the discussion, though, like I said in my last email, if you would like to forward the complaint to me I will discuss the issue with my client. In light of the Plaintiffs' last attempt to force a stipulation on discovery items prior to the hearing on Plaintiffs' Motion for Preliminary Injunction, I cannot agree to stipulate to something that I have not read and discussed with my client, especially since this request is being made two months after our last meeting. Further, since our Answer and Counterclaims were contained within the same pleading, agreeing to stipulate to an amendment at this point, after Plaintiffs have failed to timely respond to Defendants' Counterclaims, would amount to a waiver of our right to litigate Defendants' default.

If you are willing to provide me with a copy of the amended complaint so that I can discuss the issue with my client, then we would be happy to consider your request. Alternatively, we can discuss this issue further after the judge rules on our Motion for Default on January 23.

Thanks,

John

On Dec 29, 2011, at 1:48 PM, Susan Woodrow wrote:

John,

You recollection is inaccurate. It was a simple exchange. "Will you agree to let me amend" by you. "Yes, but I wish to amend as well" by me. BY you, "OK", By me "OK".

I expect that you will keep your word and not make me file a motion.

Susan Payne Woodrow, JD
PH: 248 623 1818
FX: 248 623 1811

Notice: This message contains information which may be confidential and privileged and has been sent solely for the use of the intended recipient. If you are not the intended recipient, you may not use, copy or disclose to anyone, by any means, the message or any information contained in the message. If you have received this message in error, please immediately notify the sender by reply e-mail and then delete the message.

Subject: Re: 11-13381 Stip for First Amended Complaint
From: john@traverselegal.com
Date: Thu, 29 Dec 2011 10:21:05 -0500
To: suzywoodrow@hotmail.com

Susan,

Recall at our October 26, 2011 hearing that we discussed that Defendants would withdraw their Motion for Reconsideration in exchange for the Plaintiffs' stipulation to allow Defendants to amend their answer to the Complaint/Counter-Claims and extend the time to respond to Plaintiffs' Motion for Preliminary Injunction. Though you stated that you were thinking about adding Lisa Morrow as a party at that time and stipulating to a consent judgment between HSH and AVKO, we did not agree to stipulate to an amended Complaint at that time. Two months have since passed, so I will need more information from you in order to discuss the proposed amendment with my client. Please forward me the amended Complaint and I will discuss with my client.

John

On Dec 28, 2011, at 3:39 PM, Susan Woodrow wrote:

John,

Sorry. I have attached a doc and pdf copy for you. It was, actually, a mirror image of yours, since yours was welll drafted! If it's ok, I'll file it with the court.

Susan Payne Woodrow, JD
PH: 248 623 1818
FX: 248 623 1811

Notice: This message contains information which may be confidential and privileged and has been sent solely for the use of the intended recipient. If you are not the intended recipient, you may not use, copy or disclose to anyone, by any means, the message or any information contained in the message. If you have received this message in error, please immediately notify the sender by reply e-mail and then delete the message.

From: john@traverselegal.com
Subject: Re: Stip for First Amended Complaint
Date: Wed, 28 Dec 2011 12:11:33 -0500
To: suzywoodrow@hotmail.com

Susan,

The stipulation was not attached. Please resend.

John

On Dec 28, 2011, at 12:10 PM, Susan Woodrow wrote:

John, As you recall, at the last status conference, we both agreed to stipulate to file amended complaints and cross complaints. May I affix your signature tot he attached Stip? I am working on Mr. McCabe regarding a settlement offer as a beginning point.

Susan Payne Woodrow, JD
PH: 248 623 1818
FX: 248 623 1811

Notice: This message contains information which may be confidential and privileged and has been sent solely for the use of the intended recipient. If you are not the intended recipient, you may not use, copy or disclose to anyone, by any means, the message or any information contained in the message. If you have received this message in error, please immediately notify the sender by reply e-mail and then delete the message.

John Di Giacomo, Attorney
Traverse Legal, PLC
<http://www.traverselegal.com>
Phone: 231.932.0411
Fax: 231.932.0636
Email: john@traverselegal.com

<2012-12-27_Stipulation_and_Order_For PF to file First Amended Complaint.doc><2012-12-27_Stipulation_and_Order_For PF to file First Amended Complaint.pdf>

John Di Giacomo, Attorney
Traverse Legal, PLC
<http://www.traverselegal.com>
Phone: 231.932.0411
Fax: 231.932.0636
Email: john@traverselegal.com

John Di Giacomo, Attorney

Traverse Legal, PLC
<http://www.traverselegal.com>
Phone: 231.932.0411
Fax: 231.932.0636
Email: john@traverselegal.com